

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI

IN RE:

SCRAP SOLUTIONS, LLC, A Missouri  
Limited Liability Company,  
Debtor-in-Possession.

Case No. 15-40193-705  
Chapter 11

MOTION FOR AUTHORITY TO  
USE CASH COLLATERAL

COMES NOW Scrap Solutions, LLC as Debtor and Debtor-in-Possession and submits its Motion for Order Authorizing use of cash collateral. In support of this Motion, Debtor respectfully represents as follows:

1. On January 13, 2015 the Debtor filed a voluntary petition initiating this Chapter 11 case under Chapter 11 of Title 11 of the United States Bankruptcy Code in the U.S. Bankruptcy Court for the Eastern District of Missouri.
2. Debtor is continuing to operate its Scrap Metal Reclaiming Business as a debtor in possession. No trustee or examiner has been appointed, and no official committee of creditors or equity interest holders has been established in this Chapter 11 case.
3. By this motion the Debtor seeks authority to use cash collateral on hand as of the date of filing in the amount of \$ 4,900.00 in the business bank accounts. The cash collateral sought to be used consists of a funds on deposit in an account with PNC, located in St. Louis County, Missouri, and The Bank of Edwardsville, located in Pontoon Beach, Illinois.
4. The name and address of each entity having possession of the cash collateral sought to be used is:

a) PNC Bank, located in St. Louis County, Missouri where Debtor-in-Possession maintains a business checking account.

b) The Bank of Edwardsville, located in Pontoon Beach, Illinois where Debtor-in-Possession maintains a business checking account.

5. In order to minimize the disruption to the Debtor's normal business operations, Debtor requests authority to continue to use all of its checks presently in use by Debtor. Debtor is aware that the United States Trustee guidelines no longer require Debtor to designate that it is a "debtor-in-possession" on checks, but understands that ownership of its pre-petition bank accounts must be transferred to Debtor as a Debtor in Possession.

6. The Debtor needs to continue to use the cash collateral described above in this motion in order to pay the costs associated with maintain his business operations, including payment to individuals and businesses delivering metal to be crushed to Debtor-in-Possession, payment of ongoing maintenance costs, utilities, insurance costs, transportation costs including fuel and drivers who transport the crushed and shredded metals to purchasers outside the region and to purchase materials used to repair and upgrade vehicles and equipment necessary to be maintained in the operation of Debtor's business. The Debtor has no other funds with which to pay such expenses and if such expenses are not paid the Debtor will be unable to continue its business operations.

7. There are no liens against the Debtor-in-Possession's business accounts.

8. The Debtor hereby requests an expedited hearing on this motion. The amount of cash collateral sought to be used pending the final hearing on this motion is \$6,200.00, the full amount of funds in these two accounts.

9. Debtor requests that it be permitted to continue to use its pre-petition bank accounts in

the same manner and with the same account numbers, and that such accounts be deemed Debtor-in-Possession accounts.

WHEREFORE, the Debtor prays for the entry of an order

- 1) Authorizing the Debtor to use its Cash collateral in its accounts on the date of filing;
- 2) Authorizing Debtor to continue to use its existing pre-petition bank accounts and checks;
- 3) Authorizing the use of the checks currently in use by the Debtor; and
- 4) For such other and further relief as may be just and proper.

Dated: January 21, 2015

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/s/Rochelle Stanton  
Rochelle D. Stanton, MO Bar#49641  
Attorney for Debtor in Possession, F.B.#49641MO  
745 Old Frontenac Square, Ste. 202  
Frontenac, MO 63131  
(314)991-1559/(314)991-1183 fax  
[rstanton@rochelledstanton.com](mailto:rstanton@rochelledstanton.com)

#### CERTIFICATE OF TRANSMITTAL AND SERVICE BY MAIL

The undersigned certifies under penalty of perjury that he or she has, on the date shown below, by first class mail addressed to their respective addresses of record in this case, transmitted and served a true copy of this document to the United States Trustee, the creditors listed in the Chapter 11 Schedules, and their respective attorneys of record.

January 21, 2015

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/s/Rochelle Stanton  
Rochelle D. Stanton, MO Bar No. 49641  
Attorney for Debtor in Possession  
Fed. Bar No. 49641MO  
745 Old Frontenac Square, Ste. 202  
Frontenac, MO 63131  
(314)991-1559/(314)991-1183 fax  
[rstanton@rochelledstanton.com](mailto:rstanton@rochelledstanton.com)

Internal Revenue Service  
P.O. Box 249  
Memphis, TN 38101

Missouri Department of Revenue  
P.O. Box 3800  
Taxation Division  
Jefferson City, MO 65105

American Express  
P.O. Box 297871  
Fort Lauderdale, FL 33329

Case Credit  
CNH Industrial America, LLC  
621 State Street  
Racine, WI 53402

Chase Card Services  
P.O. Box 94014  
Palatine, IL 60094-4014

Commercial Capital Company, LLC  
8215 Melrose Drive  
Suite 100  
Lenaxa, KS 66214

D.C.H., LLC  
6 Fox Creek Road  
Towanda, IL 61776

Federal Motor Carrier Safety Adm.  
P.O. Box 530226  
Atlanta, GA 30353-0226

GE Capital Corp.  
c/o Thomas G. Berndsen  
1650 Des Peres Road  
Suite 135  
Saint Louis, MO 63131

Komatsu Financial  
c/o Todd A. Lubben  
1010 Market  
20th Floor  
Saint Louis, MO 63101

Law Offices of Payne & Jones  
11000 King  
P.O. Box 25625  
Overland Park, KS 66225-5625

Madison County Collector  
157 No. Main  
Edwardsville, IL 62025

Madison County, IL  
157 No. Main  
Edwardsville, IL 62025

Occupational Safety & Health Adm.  
200 Constitution NW  
Washington, DC 20210

Pacific Finance  
c/o Conn Q. Davis  
Jenkins & Kling, P.C.  
150 No. Meramec, Ste. 400  
Saint Louis, MO 63105

Paul Thornton  
11803 Seven Hills Drive  
Florissant, MO 63033

St. Louis County Collector of Revenue  
41 S. Central Ave.  
c/o R.H. Robison  
Saint Louis, MO 63105

U.S. Department of Labor  
Wage and Hour Division  
1222 Spruce Street, Rm. 9, 102B  
Saint Louis, MO 63103

Victoria Thornton  
11803 Seven Hills Drive  
Florissant, MO 63033

Wells Fargo Equipment Finance  
733 Marquette Avenue  
Suite 700  
MAC N9306-070  
Minneapolis, MN 55402